

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA;

STEPHEN J. GREEN # 259765
PLAINTIFF;

V.

(DIRECTOR) BRIAN STIRLING; ET AL
DEFENDANT(S);

Declaration of
STEPHEN J. GREEN

e/x # 0:22-cv-01634-SAL - PJG

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DISTRICT COURT
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PLAINTIFF NOW MOVES THIS COURT BY WAY OF "DECLARATION" THAT
THIS COURT DENY DEFENDANT(S) "MOTION FOR SUMMARY JUDGMENT"
UNDER RULE 56(F) OF FEDERAL RULES OF CIVIL PROCEDURE, FOR
THE FOLLOWING REASONS;

I STEPHEN J. GREEN # 259765
HEREBY DECLARES: I HAVE SEVERAL MOTIONS CONCERNING
DEPOSITION(S) OF BOTH STAFF, WITNESS(ES) AND ENIMITIES ALIKE
THAT THIS COURT HAS YET TO RULE AND OR DECIDE; IT IS
MY BELIEF THAT THESE DEPOSITIONS WILL BOLSTER (PLAINTIFF'S)
MY LEGAL POSITION AND OR CLAIMS ALLOWING FOR THE SUBMISSION
OF EVIDENCE THAT WOULD BE OTHERWISE UNDISCOVERABLE.

I HAVE SUBMITTED MOTION(S) CONCERNING THESE DEPOSITIONS
TO THIS COURT PRAYER TO RECEIVING DEFENDANTS "MOTION
FOR SUMMARY JUDGMENT;" IN WAY OF THE FOLLOWING.

(1) MOTION FOR ENLARGEMENT, (NOVEMBER 15, 2022); (2) MOTION TO
DEPOSE ENIMITY, (NOVEMBER 17, 2022); (3) MOTION/REPLY TO

DEFENDANTS RESPONSE TO REQUEST FOR MENTAL EXAMINATION,
 (NOVEMBER 17, 2022); ⁽⁴⁾ MOTION / REPLY TO DEFENDANTS
 RESPONSE TO PLAINTIFF'S MOTION FOR DEPOSITION BY ORAL EXAMINATION.
 (NOVEMBER 18, 2022); NOTE ALL THE ABOVE DATES ARE POSTAGE
 DATES.

IT IS MY BELIEF THAT THE REQUESTED DEPOSITIONS WILL PROVIDE
 WITNESS TESTIMONY ESSENTIAL TO MY CLAIMS, AS WELL I HAVE
 PROVIDED THIS COURT WITH EVIDENCE INCLUDED IN SAID MOTION,
 BY WAY OF DOCUMENTS THAT SHOW THIS COURT, THE DEFENDANTS
 HAVE ACTIVELY BEEN INTERFERING WITH MY ABILITY TO OBTAIN
 AFFIDAVITS, AND STATEMENTS BY CONFISCATING MY VIDEOS(ES)
 AFFIDAVITS, AND STATEMENTS, AND CHARGING ME WITH CONTEMPT.

IT IS ALSO MY BELIEF THAT MY REQUEST FOR MENTAL
 EXAMINATION SHOULD BE GRANTED, AND WILL SHOW MENTAL
 ILLNESS(ES) NOT DIAGNOSED AND OR TREATED BY DEFENDANTS,
 IN THE FORM OF "HYPER RELIGIOSITY" AND OR SOME SIMILAR
 TERM USED BY THE AMERICAN PSYCHIATRIC ASSOCIATION WHICH
 IS TREATED IN SOME OF THE SAME OR SIMILAR WAY'S AS
 "GENDER DYSPHORIA" OR "GENDER IDENTITY DISORDER," AND
 THAT I AM DENIED SAID SIMILAR TREATMENT BY MENTAL
 HEALTH WITHIN SCOE.

I HAVE LIKE WIFE INCLUDED EVIDENCE WITH SAID MOTION
 FOR MENTAL EXAMINATION IN THE FORM OF DOCUMENTATION,
 AND SAID DOCUMENTATION "MENTAL HEALTH REPORTS AND NOTES"
 SHOW THAT EVEN DEFENDANTS OWN MENTAL HEALTH

PERSONNEL NOTED, THE NEEDED FOR A FULL MENTAL EVALUATION, AND THAT SECURITY DENIED THAT TREATMENT AND OR EVALUATION.

I HAVE BEEN MAKING EFFORTS BEFORE THE DEFENDANTS FILED FOR SUMMARY JUDGMENT TO SECURE DEPOSITIONS OF WITNESS(ES) AND STAFF ALIKE; AS WELL I HAVE BEEN SEEKING THE COURT'S INVOLVEMENT IN SECURING A "FULL MENTAL EXAMINATION" AS SUGGESTED BY DEFENDANTS OWN MENTAL HEALTH PROFESSIONALS. IF THE COURT DOES NOT DENY DEFENDANTS MOTION FOR SUMMARY JUDGMENT, UNDER RULE 36(f) OF F.R. CIV. P. BECAUSE "DISCOVERY" IS NOT YET COMPLETE, WITH THE AFORESAID MOTIONS HAVING YET TO BE DECIDED; I WOULD ASK THIS COURT GRANT A "CONTINUANCE", EXTENDING THE RESPONSE DUE DATE FROM 12/19/2022 TO 1/19/2023 ALLOWING FOR TIME TO DISCOVER THE OUT COMES OF SAID MOTIONS PENDING WITH THIS COURT AND CONCLUDE DISCOVERY.

IN EVENT THIS COURT GRANTS PLAINTIFF'S PENDING MOTIONS, I WOULD REQUEST DEFENDANTS MOTION FOR SUMMARY JUDGMENT COMMENCE WHEN THE PURPOSE OF SAID MOTIONS; BE IT DEPOSITION(S) OR MENTAL EXAMINATION IS CONCLUDED.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT, EXECUTED AT PERCY CORRECTIONAL INSTITUTION. ON NOV. 22, 2022.



STEPHEN J. GREISH 259760
430 OAK LAWN RD.
PERCY D.C. 25669
NOV. 22, 2022